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10 UNITED STATES DISTRICT COURT  
11 EASTERN DISTRICT OF WASHINGTON  
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13 AMANDA BANTA, SHARP  
14 SHOOTING INDOOR RANGE &  
15 GUN SHOP, INC., THE RANGE, LLC,  
16 AERO PRECISION, LLC, and  
17 NATIONAL SHOOTING SPORTS  
18 FOUNDATION, INC.,

19 Plaintiffs,

20 v.

21 ROBERT W. FERGUSON,  
22 ATTORNEY GENERAL OF THE  
23 STATE OF WASHINGTON; and  
24 JOHN R. BATISTE, CHIEF OF THE  
25 WASHINGTON STATE PATROL

Defendants.

No. 2:23-cv-00112-MKD

MOTION FOR LEAVE TO  
APPEAR PRO HAC VICE FOR  
PAUL D. CLEMENT

05/30/2023  
Without Oral Argument

21 I, Steven Fogg, counsel of record for Plaintiffs, respectfully move the Court  
22 for an Order granting admission pro hac vice to attorney Paul D. Clement to appear  
23 in the above-captioned matter as counsel for Plaintiffs pursuant to Local Rule 83.2(c).  
24 I am a licensed member in good standing of the State of Washington bar (WSBA  
25 No. 23528) and this Court.

MOTION FOR LEAVE TO  
APPEAR PRO HAC VICE- 1

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Paul D. Clement's qualifications for pro hac admission and other information required by Local Rule 83.2(c)(3) are set forth below:

A. Applicant's address and phone number:

Paul D. Clement  
Clement & Murphy, PLLC  
706 Duke Street  
Alexandria, VA 22314  
(202) 742-8900

B. Dates of admission to practice before other courts:

<b>Court</b>	<b>Admission Date</b>
Virginia State Bar	10/06/1994
District of Columbia Bar	05/03/1996
Wisconsin State Bar	05/29/2003
Supreme Court of the United States Bar	01/24/2000
U.S. Court of Appeals for the First Circuit	08/06/2010
U.S. Court of Appeals for the Second Circuit	11/10/2003
U.S. Court of Appeals for the Third Circuit	08/02/2011
U.S. Court of Appeals for the Fourth Circuit	03/30/2000
U.S. Court of Appeals for the Fifth Circuit	09/28/2009
U.S. Court of Appeals for the Sixth Circuit	03/02/2000
U.S. Court of Appeals for the Seventh Circuit	01/09/2000
U.S. Court of Appeals for the Eighth Circuit	09/03/1996
U.S. Court of Appeals for the Ninth Circuit	06/14/2002
U.S. Court of Appeals for the Tenth Circuit	03/22/2000
U.S. Court of Appeals for the Eleventh Circuit	01/27/2009
U.S. Court of Appeals for the District of Columbia Circuit	07/31/1996
U.S. Court of Appeals for the Federal Circuit	04/19/2000
U.S. Court of Federal Claims	11/03/2016
U.S. District Court for the District of Columbia	09/29/2009

MOTION FOR LEAVE TO  
APPEAR PRO HAC VICE- 2

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U.S. District Court for the Northern District of Florida	05/01/2015
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C. Name, address, and phone number of admitted counsel with whom the applicant is associated.

Steven Fogg  
Corr Cronin LLP  
1015 Second Avenue, Floor 10  
Seattle, WA 98104-1001  
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D. The necessity for appearance by the applicant.

Given his experience and the focus of his practice, Paul D. Clement's participation in this action would benefit Plaintiffs and would assist in ensuring a fair and efficient resolution of this matter.

E. Whether the applicant has any pending disciplinary sanction actions or has ever been subject to disciplinary sanctions by any court or bar association.

Mr. Clement does not have any pending disciplinary sanctions against him, nor has he ever been subject to any disciplinary sanctions by any court or bar admission.

WHEREFORE, we respectfully request that the Court admit Paul D. Clement to appear pro hac vice in this action as counsel for Plaintiffs.

DATED this 27th day of April, 2023.

CORR CRONIN LLP

s/ Steven W. Fogg  
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MOTION FOR LEAVE TO  
APPEAR PRO HAC VICE- 3

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2 Paul D. Clement (*pro hac vice forthcoming*)  
3 Erin E. Murphy (*pro hac vice forthcoming*)  
4 Matthew D. Rowen (*pro hac vice forthcoming*)  
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*Attorneys for Plaintiffs*

MOTION FOR LEAVE TO  
APPEAR PRO HAC VICE- 4

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 27, 2023, I caused to be electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which in turn automatically generated a Notice of Electronic Filing (NEF) to all parties in the case who are registered users of the CM/ECF system. The NEF for the foregoing specifically identifies recipients of electronic notice. I hereby certify that I have also served the foregoing with the complaint on all defendants when accomplishing service of process.

DATED this 27th day April, 2023.

s/ Steven W. Fogg

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